

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ELIZABETH HILL,	:	Chapter 13
EDWARD HILL,	:	
Debtor	:	Bankruptcy No: 15-14914

**MOTION TO CONVERT FROM CHAPTER 13 CASE
TO CASE UNDER CHAPTER 7**

COMES NOW, the Debtors Elizabeth and Edward Hill who file this motion to convert from a Chapter 13 to a Chapter 7 and in support thereof, says:

1. The Debtors are Elizabeth and Edward Hill.
2. The Debtors filed a petition for protection pursuant to Chapter 13 of the Bankruptcy Act 11 U.S.C. § 101 et. seq.
3. The Debtor had been able to make her plan payments so long as her husband lived and she had his support.
4. The Debtor's husband died on or about April 7, 2016 and solely as a result of his death, the debtor is no longer able to make her plan payments.

WHEREFORE, the Debtors, **Elizabeth and Edward Hill**, pray this Honorable Court to:

- A. Grant relief in accordance with Chapter 7 of the Bankruptcy Code; and
- B. Grant such other relief as this Court deems fitting and just.

Dated: 11/29/2017

/s/Joseph Bambrick
Joseph T. Bambrick, Jr., Esquire
Attorney for Debtor
Bar No. 45112
529 Reading Avenue, Suite K
West Reading, PA 19611